Ballstaedt Law Firm, LLC dba Fair Fee Legal Services Seth D. Ballstaedt, Esq. Bar # 11516 2 8751 W Charleston Blvd #220 Las Vegas, NV 89117 3 (702) 715-0000 help@bkvegas.com 4 UNITED STATES BANKRUPTCY COURT 5 DISTRICT OF NEVADA 6 Case No. 22-11539-mkn In re:) Trustee: BRIAN D. SHAPIRO 7 8 BBC GROUP CA, LLC Chapter: 11 9 Debtor(s) 10 11 **STIPULATION** 12 Creditor Century City Mall, LLC (hereinafter referred to as "Landlord") and BBC 13 GROUP CA, LLC (hereinafter referred to as "Debtor) by and through their respective 14 parties of record hereby enter into the stipulation with the terms and conditions set 15 forth below: 16 1. The lease for certain premises known as Store Number FC9 in Westfield 17 Century City, Los Angeles, California (hereinafter referred to as the "Premises"), shall be rejected as of the later of (i) June 15, 2022; and (ii) the date Debtor or Debtor's 18 counsel provides written notice to Landlord or Landlord's managing agent or counsel 19 that Landlord may immediately take possession of the Premises, and such notice shall 20 include any keys, key codes, and/or security codes for the Premises (the later date being the "Rejection Effective Date"); 21 2. Any and all personal property remaining at the Premises shall be deemed 22 abandoned as of the Rejection Effective Date and Landlord may retain or dispose of 23 such property without liability to Debtor or any third party, with Landlord reserving 24 claims for the costs of such disposition;

3. Debtor shall dispose of all personally identifiable information and hazardous

materials, if any, at the Premises by the Rejection Effective Date;

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4. Debtor consents to relief from the automatic stay to permit Landlord to take possession of the Premises and deal with any remaining personal property; and 5. Landlord may assert a claim under Bankruptcy Code sections 365(d)(3) and/or 503(b) for lease obligations from the petition date through the Rejection Effective Date, with Debtor's rights to object reserved. Dated 6/15/2022 Submitted by: /s/ Seth D Ballstaedt, Esq. Seth D Ballstaedt, Esq. Attorney for Debtor(s) Dated: June 15, 2022 BY: <u>/s/ Scott L. Fleischer, Esq.</u> Scott L. Fleischer, Esq. Attorney for Century City Mall, LLC